

KIRTON LAW FIRM

Marlon G. Kirton, Esq.

*Nassau County:
175 Fulton Avenue, Suite 305
Hempstead, New York 11550
Tel. # (516) 833-5617
Fax # (516) 833-5620*

January 19, 2021

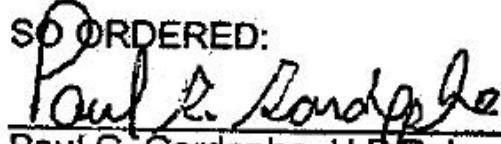
VIA ELECTRONIC FILING

Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall
United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: January 20, 2021

Re: *United States v. Alexei Saab, 19 cr. 676 (PGG)*

Dear Judge Gardephe:

I represent Alexei Saab in the above-referenced matter. The second round of defense pretrial motions presently due on or before January 19, 2021; however, I write with the consent of the government to respectfully request a two-week extension of time for the defense to file its motions. This is the second request for an extension.

This extension is being requested because the parties are discussing whether a pretrial resolution of this matter is possible, and—given the difficulties of communicating with my client in the present circumstances, as well as the need to review and discuss discovery—the parties would benefit from a brief period of additional time, until February 9, 2021, to conclude these discussions. Should the parties be in a position to request a date for a change of plea by February 9th, the parties will advise the Court; if not, the defense will file its motions, and at that time, the parties will propose a schedule for the remaining briefing such that the motions would be fully briefed in advance of the previously scheduled hearing date, presently set for April 3, 2021.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton

Marlon G. Kirton, Esq.

cc: Jessica Fender, Assistant United States Attorney (via electronic mail)
Jason Richman, Assistant United States Attorney (via electronic mail)
Esere Onaodowan, Esq. (via electronic mail)